

FILED
3/3/2025

QR

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Vicqui Washington

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 2023-cv-01211
(To be supplied by the Clerk of this Court)

John Dwyer, Jr., et al

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

AMENDED COMPLAINT

☒ **COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code** (state, county, or municipal defendants)

_____ **COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code** (federal defendants)

_____ **OTHER** (cite statute, if known)

***BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.***

I. Plaintiff(s):

- A. Name: Vicqui Washington
- B. List all aliases: _____
- C. Prisoner identification number: N/A
- D. Place of present confinement: N/A
- E. Address: 7235 S. Dobson Ave, Chicago, Illinois 60619

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: John Dwyer, Jr., et al
- Title: Attorney
- Place of Employment: Retired
- B. Defendant: McDevitt & Cobb, P.C., f.k.a McDevitt Law P.C., f.k.a Dwyer & McDevitt, Law Offices, P.C.
- Title: _____
- Place of Employment: _____
- C. Defendant: _____
- Title: _____
- Place of Employment: _____

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Washington v. Jackson, et al, 2014-L-8928
- B. Approximate date of filing lawsuit: August 26, 2014
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Vicqui Washington, Victim #1 and Victim #2
- D. List all defendants: Phylcia Vanzant, Dennis Jackson and City of Chicago Dept of Transportation.
- * The Defendant's were selected by my attorney
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Cook County Circuit Court
- F. Name of judge to whom case was assigned: Judge Janet Brosnahan
- G. Basic claim made: Motor Vehicle Accident
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Insurance Stay Calendar (total of 4 times- last Insurance Stay Calendar was granted in 2014)
- I. Approximate date of disposition: December 10, 2015- First Insurance Stay Calendar
- * See attached for additional pending lawsuits

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

1. On August 6, 2014, I was informed that my son (Victim #1) had been critically injured in a serious accident. I did not learn that my other son (Victim #2) had survived the accident until several hours later, after I arrived at Stroger Hospital. My family informed me that Victim #2 had also survived.

2. On August 6, 2014, Victim #1 sustained head trauma, chest trauma, and abdominal trauma. While Victim #1 was under the care of Stroger Hospital, glass was removed from his eyes but remained on the rest of his face.

3. On August 6, 2014, Victim #2 sustained a brain injury (Intraparenchymal hemorrhages), a small right frontal contusion with a mental status change (initial GCS 11), and a severe cut on his arm that remained open and exposed from the time he arrived at 2:20 am until 5:30 am. The CPD/MAIU accident investigation report stated that Victim #2 had no visible injuries. Additionally, his bloody clothes and cell phone, on which I had left messages, disappeared from Stroger Hospital before I arrived.

4. On August 7, 2014, a day after arriving with multiple traumatic injuries, Victim #1 (age 16) was discharged from Stroger Hospital with two broken bones in his nose and glass still in his face. I was unaware that his nose had not been reset and that glass remained in his face.

5. On August 7, 2014, according to an online news article, a witness at the scene of the August 6, 2014 accident stated that a police chase had occurred. However, CPD News Affairs denied the chase of

Unit #1. After learning from the news article that my children were critically injured due to a CPD chase, I contacted Corboy & Demetrio for legal representation.

6. On August 10, 2014, I met with Attorney Matthew T. Jenkins and signed retainers for legal representation. During our meeting, Attorney Jenkins met Victim #1 and saw my son's visible facial injuries firsthand. Victim #2 was still in the hospital.

7. After our meeting, Attorney Jenkins went to the El-Mogaber home to meet with the mother of Victim #3 to discuss representing her son, who was still in the hospital.

8. On August 11, 2014, Victim #2 (age 17), who had sustained a brain injury, was discharged from Stroger Hospital. Throughout his hospitalization and discharge, Plaintiff Washington (his mother) and her family were never informed about the type of treatment or the reasons for the treatment administered.

9. On September 22, 2014, El-Mogaber's court case was initially on Calendar "J" before the Consolidation of El-Mogaber v. Jackson, et al (2014-L-9332) into Washington v. Jackson, et al (2014-L-8928). See Exhibit A.

10. In 2014, before Attorney John Dwyer, Jr. retired, Victim #1 and Victim #2 (Plaintiff's children) were told by their friend (a client of Dwyer & McDevitt) that his new attorney wanted to speak with them. El-Mogaber took my sons to the area of his home where his new attorney was waiting and introduced them. After the introduction, the new attorney expressed interest in representing my children.

* Dwyer & McDevitt was the law firm when the new attorney expressed interest in representing my children alongside El-Mogaber.

* Dwyer & McDevitt Law P.C. changed its name to McDevitt Law P.C. in 2015, the same month Attorney John Dwyer, Jr. retired.

See attached for the rest of my Amended Complaint

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

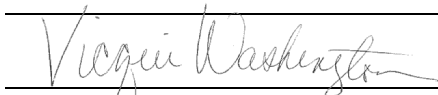
Please see attached

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 28 day of February, 2025



(Signature of plaintiff or plaintiffs)

Vicqui Washington
(Print name)

(I.D. Number)

7235 S. Dobson Ave, Chicago, IL 60619
(Address)

Plaintiff: Vicqui Washington

Date: February 28, 2025

Amended Complaint

Information for Lawsuit #2

III. List all lawsuits you (and your co-plaintiffs, if any) have filed in any State or any Federal Court in the United States:

- A. Name of case and docket number: Washington v. City of Chicago, et al.
2023-CV-01211
- B. Approximate date of filing lawsuit: February 22, 2023
- C. List all plaintiffs (if you had co-plaintiffs) including any aliases: Vicqui Washington
- D. List all defendants: City of Chicago, et al (46 defendants in total)
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): The Northern District of Illinois
- F. Name of judge to whom case was assigned: Judge John F. Kness
- G. Basic claim made: Deprivation of Constitutional Rights
- H. Disposition of this case: This case is still pending
- I. Approximate date of disposition: To be determined by Judge John F. Kness

Information for Lawsuit #3

III. List all lawsuits you (and your co-plaintiffs, if any) have filed in any State or any Federal Court in the United States:

- A. Name of case and docket number: Washington v. East Lake Management
Group Inc., et al, 2024-CV-00599
- B. Approximate date of filing lawsuit: January 22, 2024

- C. List all plaintiffs (if you had co-plaintiffs) including any aliases: Vicqui Washington
- D. List all defendants: East Lake Management Group Inc., Charles Bellamy, Tamela Franklin, Johnetta Wimbish, Eileen Rhodes, National Housing Compliance, David A Pope, Karen Romaine Thomas, Serena, Valerie Todaro
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): The Northern District of Illinois
- F. Name of judge to whom case was assigned: Judge Franklin U. Valderrama
- G. Basic claim made: Deprivation of Constitutional Rights
- H. Disposition of this case: This case is still pending
- I. Approximate date of disposition: To be determined by Judge Franklin U. Valderrama

Plaintiff Vicqui Washington's Amended Complaint

11. After returning home, my children told me about El-Mogaber's new attorney and how he offered to represent them. I immediately called Corboy & Demetrio and informed Attorney Matthew T. Jenkins of what my children had said. Near the end of our conversation, Attorney Jenkins stated that he would call El-Mogaber to find out what was happening. However, Attorney Jenkins and I never discussed the outcome of that conversation.

12. On November 24, 2014, Corboy & Demetrio filed a Motion to Withdraw as Attorney, and Dwyer & McDevitt filed a Substitution of Attorney. Both motions were filed in El-Mogaber's court case and were granted the same day. See Exhibit B.

13. On December 4, 2014, Attorney Daniel McDevitt of Dwyer & McDevitt Law P.C. filed motions to consolidate El-Mogaber v. Jackson, et al (2014-L-9332) with Washington v. Jackson, et al (2014-L-8928). See Exhibit C.

14. On December 11, 2014, the Cook County Circuit Court granted Attorney Ronald W. Cobb III of "Dwyer & McDevitt" the consolidation of El-Mogaber v. Jackson, et al into Washington v. Jackson, et al. Plaintiff Washington was not informed about the consolidation until April of 2017, after requesting a copy of her file from Corboy & Demetrio. See Exhibit D, page 1 (presented as evidence by Attorney Cobb) and Exhibit D, page 2 (Plaintiff Washington received this copy of the consolidation in 2017 from Corboy & Demetrio).

15. On December 29, 2014, Askounis & Darcy P.C. filed a legal document as Plaintiff Washington's attorney. Plaintiff Washington received a copy of this document from the Cook County Circuit Court in 2019.

- Corboy & Demetrio is the only law firm with which I signed retainers.

16. On January 1, 2015, Attorney John Dwyer, Jr. retired.

17. On January 15, 2015, McDevitt Law Offices P.C. filed a "Notice of Change of Firm Name" in Mr. El-Mogaber's case under Plaintiff Washington's docket number (2014-L-8928). See Exhibit E

- The information on this document appears on Plaintiff Washington's Cook County Circuit Court docket as "Notice of Change of Office Filed"
- The information listed on line 17 did not appear on El-Mogaber's Cook County Circuit Court docket.

18. On January 30, 2015, a Focus Case Management Order was issued with McDevitt Law P.C. as the attorney. The participant listed was Plaintiff Washington. See Exhibit F.

- This information appears on both Plaintiff Washington's and El-Mogaber's court dockets.

19. On March 19, 2015, a Case Management Order scheduled a subsequent Case Management Conference for April 21, 2015. The attorney listed was McDevitt Law Offices P.C., and Plaintiff Washington was the listed participant. See Exhibit G.

20. On April 21, 2015, a Case Management Order allowed the deposition of Ms. Vanzant (the owner of the car that allegedly critically injured my children) to proceed at the next CMC (scheduled for June 5, 2015). Attorney Daniel Kirschner represented Plaintiff Washington. See Exhibit H, page 1.

- The deposition of Ms. Vanzant and the case continuation are reflected on Plaintiff Washington's and El-Mogaber's court dockets.
- Plaintiff Washington only learned about the deposition in April of 2017.

21. A Notice of Discovery Deposition was issued to Attorney Ronald W. Cobb III regarding the deposition of Ms. Vanzant, scheduled for May 26, 2015, at Corboy & Demetrio. See Exhibit H, page 2.

22. On June 5, 2015, a Case Management Order scheduled a subsequent conference for July 14, 2015, regarding the receipt of information from IDOT. McDevitt Law was the attorney, and Plaintiff Washington was the participant. Both consolidated case numbers (2014-L-8928/2014-L-9332) are listed on this document. See Exhibit I.

23. On July 14, 2015, a Case Management Order scheduled the next conference for August 13, 2015. Attorney McDevitt Law-RWC represented Plaintiff Washington and El-Mogaber. Both consolidated case numbers (2014-L-8928/2014-L-9332) are listed on this document. See Exhibit J.

24. On August 13, 2015, a Case Management Order scheduled the next conference for September 14, 2015, the same day El-Mogaber's court case was voluntarily dismissed with leave to refile. Attorney McDevitt Law-RWC represented Plaintiff

Washington and El-Mogaber. Both consolidated case numbers (2014-L-8928/2014-L-9332) are listed on this document. See Exhibit K.

25. On September 1, 2015, a subpoena was issued in the civil matter for Ms. Vanzant to appear at Corboy & Demetrio for a deposition on September 3, 2015. See Exhibit L.

- To my knowledge, this court filing does not appear on any of the court dockets.

26. Attorney Ronald W. Cobb III at McDevitt Law P.C. continued to file court documents into Plaintiff Washington's court case as her attorney until September 14, 2015, the same day El-Mogaber's case was granted a Voluntary Dismissal with Leave to Refile.

- El-Mogaber's case was allegedly refiled in 2017.
- Plaintiff Washington was never invited to court.

27. On September 14, 2015, the Dismissal Order was submitted to the court by Attorney Ronald W. Cobb III. See Exhibit M, page 1.

28. On September 14, 2015, after El-Mogaber's case was granted a Voluntary Dismissal with Leave to Refile, Corboy & Demetrio resumed representing Plaintiff Washington's court case.

29. On September 14, 2015, a Case Management Order scheduled the next conference for October 29, 2015. Attorney Corboy & Demetrio is the attorney for Plaintiff Washington. Both consolidated case numbers (2014-L-8928/2014-L-9332) are listed on this document. See Exhibit M, page 2.

30. On December 10, 2015, Plaintiff Washington's Cook County Circuit Court case was placed on the Insurance Stay Calendar for the first time, granted four times in total. The last Insurance Stay Calendar was granted in 2024. Plaintiff Washington was not aware of Corboy & Demetrio filing the Motion to be removed and then placing my case back on the Insurance Stay Calendar until receiving a copy of the Motions via certified mail.

- Plaintiff Washington was informed about the first insurance stay in April of 2017.

31. In April 2017, Plaintiff Washington was asked by Corboy & Demetrio to sign a release. After refusing to sign anything, Plaintiff Washington received a letter from Corboy & Demetrio stating that they would no longer represent my family. The letter informed me that my court case was placed on the Insurance Stay Calendar in December 2015, and if I wished to pursue the case, I would need to find new legal representation before my children's statute of limitations expired on their 20th birthday. My oldest son's 20th birthday was just a few days after receiving the letter.

- I was not informed about the Insurance Stay Calendar until over a year later, in April of 2017.
- Corboy & Demetrio confirmed the CPD chase of Unit #1 before and after the letter discontinuing representing my court case
- I was never invited to court.

32. Plaintiff Washington immediately began reaching out to attorneys to find new legal representation. During a conversation with one of these attorneys, I learned that my attorney was McDevitt P.C. Law Offices. I was in shock.

33. Plaintiff Washington made significant efforts for years to find a replacement attorney. After many attorneys reviewed the court information for myself and El-Mogaber, they declined to take on my case. I understood that representing me could risk their law licenses. Since I had no law license to lose, I decided to represent myself and fight for justice.

34. I, Plaintiff Washington, did not assume that Dwyer & McDevitt filed legal documents with my name on them. Instead, I was provided with the paperwork years after the filings had already been made.

35. I, Plaintiff Washington, was informed by multiple attorneys that McDevitt Law, P.C. was acting as my legal representative. I did not know that McDevitt Law, P.C. acted as my attorney until I was told.

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ABRAHAM EL-MOGABER,

vs. Plaintiff(s).

DENNIS JACKSON,

Defendant(s).

NO. 14 L 9332

Lynn M. Egan, Judge Presiding
General Calendar "J"

ORDER

This matter coming to be heard upon assignment to Calendar "J," and the initial case management having been set for October 30, 2014 at 9:30 a.m., IT IS HEREBY ORDERED THAT plaintiff shall present a pre-trial memorandum to Room 1904 chambers three days prior to the initial case management date.

C
P.B.

4619
4253

ENTERED:

Lynn M. Egan, Circuit Court Judge

JUDGE LYNN M. EGAN

SEP 22 2014

Circuit Court-1683

PLAINTIFF'S
EXHIBIT

A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

14-159

Atty. No. 56186

ABRAHAM EL-MOGABER,

Plaintiff,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

Defendants.

No. 2014 L 9332

ROUTINE ORDER

THIS MATTER coming to be heard upon the Routine Motion of the Plaintiff, ABRAHAM EL-MOGABER to substitute his counsel, the court being fully advised, it is hereby ordered as follows:

IT IS HEREBY ORDERED that the law firm of CORBOY & DEMETRIO is given leave to withdraw as the attorneys for the plaintiff, ABRAHAM EL-MOGABER and that the LAW OFFICES OF DWYER & McDEVITT is given leave to appear on behalf of the plaintiff.

Entered

Judge's No.

JUDGE LYNN M. EGAN

NOV 24 2014

Circuit Court - 1683

Law Offices of Dwyer & McDevitt
221 North LaSalle Street
Suite 1600
Chicago, Illinois 60601
(312) 332-0072

PLAINTIFF'S
EXHIBIT

B

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

14-159

Atty. No. 56186

ABRAHAM EL-MOGABER,

Plaintiff,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

Defendants.

No. 2014 L 9332



VICQUI WASHINGTON, Mother and Next
Friend of [REDACTED], a minor, and
[REDACTED] a minor,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

No. 2014 L 8928

2014 DEC -4 PM 12:51
CLERK OF COURT

MOTION TO CONSOLIDATE

NOW COMES the plaintiff, ABRAHAM EL-MOGABER, by and through his attorneys
Law Offices of Dwyer & McDevitt and in support of his Motion to Consolidate, hereby states as
follows:

1. On August 6, 2014 ABRAHAM EL-MOGABER was the operator of a motor
vehicle involved in a collision with a vehicle operated by DENNIS JACKSON.
2. On August 6, 2014, the vehicle operated by ABRAHAM EL-MOGABER was
occupied by [REDACTED] and [REDACTED].
3. A lawsuit was filed on behalf of ABRAHAM EL-MOGABER in the Circuit
Court of Cook County against DENNIS JACKSON and PHYLICIA VANZANT for the injuries
ABRAHAM EL-MOGABER suffered. The court number for that filing is 2014 L 9332.

PLAINTIFF'S
EXHIBIT

C, pgs 1-2

4. A lawsuit was also filed in the Circuit Court of Cook County, by Vicqui Washington; mother and next friend of [REDACTED] and [REDACTED] against DENNIS JACKSON and PHYLICIA VANZANT for the injuries [REDACTED] and [REDACTED] suffered in the same collision. The court number for that case is 2014 L 8928.

5. 2014 L 8928 is currently pending on Calendar D.

6. The plaintiff, ABRAHAM EL-MOGABER asks that 2014 L 9332 be consolidated with 2014 L 8928 which is the first of the two filings and that the cases pend on Calendar D.

WHEREFORE, the plaintiff, ABRAHAM EL-MOGABER asks that 2014 L 9332 be consolidated with 2014 L 8928 and that the cases pend on Calendar D.



Daniel J. McDevitt
Law Offices of Dwyer & McDevitt
221 North LaSalle Street
Suite 1600
Chicago, Illinois 60601
(312) 332-0072

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

14-159

Atty. No. 56186

ABRAHAM EL-MOGABER,

Plaintiff,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

Defendants.

VICQUI WASHINGTON, Mother and Next
Friend of [REDACTED], a minor, and
[REDACTED], a minor,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

No. 2014 L 9332

No. 2014 L 8928

7035

MOTION TO CONSOLIDATE

NOW COMES the plaintiff, ABRAHAM EL-MOGABER, by and through his attorneys
Law Offices of Dwyer & McDevitt and in support of his Motion to Consolidate, hereby states as
follows:

1. On August 6, 2014 ABRAHAM EL-MOGABER was the operator of a motor
vehicle involved in a collision with a vehicle operated by DENNIS JACKSON.
2. On August 6, 2014, the vehicle operated by ABRAHAM EL-MOGABER was
occupied by Thomas [REDACTED] and [REDACTED]
3. A lawsuit was filed on behalf of ABRAHAM EL-MOGABER in the Circuit
Court of Cook County against DENNIS JACKSON and PHYLICIA VANZANT for the injuries
ABRAHAM EL-MOGABER suffered. The court number for that filing is 2014 L 9332.

PLAINTIFF'S
EXHIBIT

C, pgs 3-4

4. A lawsuit was also filed in the Circuit Court of Cook County, by Vicqui Washington, mother and next friend of [REDACTED] and [REDACTED] against DENNIS JACKSON and PHYLICIA VANZANT for the injuries [REDACTED] and [REDACTED] suffered in the same collision. The court number for that case is 2014 L 8928.

5. 2014 L 8928 is currently pending on Calendar D.

6. The plaintiff, ABRAHAM EL-MOGABER asks that 2014 L 9332 be consolidated with 2014 L 8928 which is the first of the two filings and that the cases pend on Calendar D.

WHEREFORE, the plaintiff, ABRAHAM EL-MOGABER asks that 2014 L 9332 be consolidated with 2014 L 8928 and that the cases pend on Calendar D.



Daniel J. McDevitt
Law Offices of Dwyer & McDevitt
221 North LaSalle Street
Suite 1600
Chicago, Illinois 60601
(312) 332-0072

RECEIVED

ATTY.

FILE

DEC - 6 2014

CORBOY & DEMETRIO

Recpt.

Dock.

Lawyr.

Sum.

Asst.

Clerk

SCANNED

Order

"D" MHS

(2/24/05) CCG N002

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Vicq Washington, et al.

v.

Jackson, et al.

No. 2014 L 8928

14L 9332

ORDER

On this cause coming to be heard, this Court being fully advised on the premises, it is hereby ordered:

- 1) 2014 L 9332 is consolidated into 2014 L 8928; 4216
- 2) 2014 L 9332 is hereby ~~stricken~~ ^{removed} from assignment to Calendar "J", Judge Egan;
- 3) The ^{4:30 am} 01/01/2015 status date before Judge Egan is hereby stricken; 4304
- 4) This consolidated case, 2014 L 8928, will continue assignment to Calendar "D", Judge Brushanah; 8213 - 1847
- 5) The 12/19/14 @ 10:30 status date in front of Judge Brushanah 4335 will proceed. - 4619

Atty. No.: 56186

Name: Dwyer + McDevitt - RMLAtty. for: IT - El - MagabierAddress: 221 N. LaSalle, Ste. 1600City/State/Zip: Chicago, IL 60601Telephone: (312) 332-6072

ENTERED:

Dated: [Signature]

Judge

Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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PLAINTIFF'S
EXHIBIT

D, pg 1

EXHIBIT

A

Order

(2/24/05) CCG N002

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Vicqui Washington, et al.

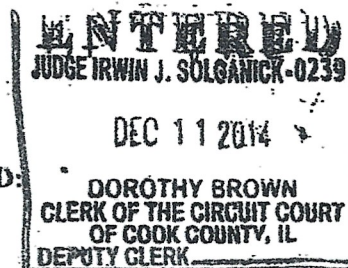
v.

Jackson, et al.No. 2014 L 8928

ORDER

On this cause coming to be heard, this Court being fully advised on the premises, it is hereby ordered:

- 1) 2014 L 9332 is consolidated into 2014 L 8928; • 4216
- 2) 2014 L 9332 is hereby ~~stricken~~ ^{removed} from assignment to Calendar "J", Judge Egan;
- 3) The 01/07/2015 ^{9:30 am} status date before Judge Egan is hereby stricken; 4304.
- 4) This consolidated case, 2014 L 8928, will continue assignment to 8213 Calendar "D", Judge Brushnahan; - 1847
- 5) The 12/19/14 @ 10:30 status date in front of Judge Brushnahan ⁴³³⁵ will proceed. - 4619

Atty. No.: 56186Name: Dwyer + McDevitt - RHLAtty. for: IT - El - MagabierAddress: 221 N. LaSalle, Ste. 1200City/State/Zip: Chicago, IL 60601Telephone: (312) 332-0072Dated: [Signature]

Judge

Judge's No.

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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PLAINTIFF'S
EXHIBITD, pg 2

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

14-1593
Atty. No. 56118

ABRAHAM EL-MOGABER,

Plaintiff,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

Defendants.

2015 JAN 15 AM 10:05

CLERK OF CIRCUIT COURT
LAW DIVISION

No. 2014 L 8928

VICQUI WASHINGTON, Mother and Next
Friend of THOMAS JAMES, a minor, and
ZACHARY JAMES, a minor,

v.

DENNIS JACKSON and
PHYLICIA VANZANT,

NOTICE OF CHANGE OF FIRM NAME

TO: Matthew Jenkins
Corboy & Demetrio
33 N. Dearborn Street
Chicago, IL 60602

Phylicia Vanzant
10210 S. Eggleston
Chicago, IL 60628

PLEASE TAKE NOTICE that on the 1st day of January, 2015 the following name
change took place:

From.

Law Offices of Dwyer & McDevitt
221 North LaSalle Street
Suite 1600
Chicago, Illinois 60601
(312) 332-0072
Atty. No. 56118

To.

McDevitt Law Offices, P.C.
221 North LaSalle Street
Suite 1600
Chicago, Illinois 60601
(312) 332-0072
Atty. No. 56118

McDevitt Law Offices, P.C.
221 N. LaSalle Street, Suite 1600
Chicago, Illinois 60601
(312) 332-0072
Atty. No. 56118

PLAINTIFF'S
EXHIBIT

E

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW I

Rev. 3/14

Plaintiffs

Defendants

NO: 14 L 8928 cover w/ 14 L 9332

Motion Call: "D" Time: 10:30 Line # 34

2005 Trial Date:

****FOCUSED CASE MANAGEMENT ORDER******** (Please check off all pertinent paragraphs and circle proper party name) ****

- (4231) 1. Written, 213 (f)(1), (f)(2) & 214 discovery to be issued by _____ or deemed waived;
- (4296) 2. Written, 213(f)(1), (f)(2) & 214 discovery to be answered by _____;
- (4218) 3. Oral discovery (fact & (f)(1) depositions to be completed by _____;
- (4288) 4. Subpoenas for treating physicians' & (f)(2) depositions to be issued by _____ or deemed waived;
- (4218) 5. Treating physicians & (f)(2) depositions to be completed by _____;
- (4231) 6. Rule 213(f)(3) discovery to be issued by _____ or deemed waived;
- (4206) 7. (Plaintiff) - (Defendant) - (Add. Party) shall answer 213 (f)(3) Interrogatories by _____;
- (4218) 8. Plaintiff's 213(f)(3) witnesses' depositions to be completed by _____;
- (4218) 9. Defendant's 213(f)(3) witnesses' depositions to be completed by _____;
- (4218) 10. Add. party's 213(f)(3) witnesses' depositions to be completed by _____;
- (4295) 11. All fact, SCR 213(f)(1), SCR 213(f)(2), and SCR 214 discovery is closed. (Circle all applicable)
- (4328) 12. The matter is continued for subsequent Focused Case Management Conference on 3/19/15 at 10:30 AM/PM in Room 2208 for:

- (A) Proper Service (B) Appearance of D'S & TPD'S (C) Case Value
- (D) Pleadings Status (E) Discovery Status (F) Pre-Trial/Settlement
- (G) Mediation Status (H) Trial Certification (I) Other (specify below)

4209 Special process server on behalf of plaintiff El Morgan. Licensed 117-001119.

- (4005) 13. Case is DWP'd. (4040) The case is voluntarily dismissed pursuant to 735 ILCS 5/2-1009.

NAME: redacted

ADDRESS: 221 N LaSalle

PHONE: 332-0072

ATTY ID#: 56119

ATTY FOR PARTY: El Morgan

ENTER:

NOTICE:

* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES BY ALL ATTORNEYS!!!

* FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219(C) SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY. OF SUCH DISCOVERY BY THAT PARTY.

JUDGE

NO.

ENTERED

JUDGE LARRY AXELROBB, 1900

JAN 30 2015

DOROTHY BROWN

CLERK OF THE CIRCUIT COURT

OF COOK COUNTY

DEPUTY CLERK

PLAINTIFF'S EXHIBIT

F

COUNTY DEPARTMENT-LAW DIVISION

Plaintiffs

Washington, et al.

-v-

Defendants.

JacksonNO: 14 L 8928 / 14 L 9332Motion Call: "D" Time: 10:30 Line#: _____2005 Trial Date: n/a****CASEMANAGEMENT ORDER*******(Please check off all pertinent paragraphs and circle proper party name)****

- (8230) _____ 1. Category #1 (18-mo. discovery) (8232) _____ 1A. Category #2 (28-mo. Discovery)
- (4231) _____ 2. Written, 213(f)(1), (f)(2) and 214 discovery to be issued by _____ or deemed waived;
- (4296) _____ 3. Written, 213(f)(1), (f)(2) and 214 discovery to be answered by _____
- (4218) _____ 4. Party depositions, fact, 213(f)(1) and/or (2) depositions to be completed by _____
- (4288) _____ 5. Subpoenas for treating physicians' depositions issued by _____ or deemed waived;
- (4218) _____ 6. Treating physician depositions to be completed by _____
- (4206) _____ 7. (Plaintiff) - (Defendant) - (Add. Party) shall answer 213(f)(3) Interrogatories by _____
- (4218) _____ 8. Plaintiff's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) _____ 9. Defendant's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) _____ 10. Add. Party's 213(f)(3) witnesses' depositions to be complete by _____
- (4295) _____ 11. All fact discovery, SCR 213(f)(1) and/or SCR(f)(2) discovery is closed. (Circle all applicable)
- (4619) K 12. The matter is continued for subsequent Case Management Conference on 04/11/2015 at 10:30 AM PM in Room 2207 for.

- (A) _____ Proper Service (B) N Appearance of D'S & TPD'S (C) _____ Case Value
- (D) _____ Pleadings Status (E) _____ Discovery Status (F) _____ Pre-Trial/Settlement
- (G) _____ Mediation Status (H) _____ Trial Certification (I) _____ Other (specify below)

- (4005) _____ 13. Case is DWP'd
- (4331) _____ 14. Case Stricken from CMC Call

- (4040) _____ The Case is Voluntarily dismissed pursuant to 735 ILCS 5/2-1009
- (4284) _____ Motion Stricken or Withdrawn from Call
- (4330) _____ Case Stricken from Motion Call

ENTER:

Janet Adams Brown

ATTY NAME: McDonald Law
 ADDRESS: 121 N. LaSalle
 PHONE: (312) 331-0012
 ATTY ID#: 6649
 ATTY FOR PARTY: IF

NOTICE:

* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES.

* FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219 SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

JUDGE

ENTERED
 JUDGE JANET ADAMS BROWN-1847
 MAR 13 2015
 DOROTHY BROWN
 CLERK OF THE CIRCUIT COURT
 OF COOK COUNTY, IL
 DEPUTY CLERK

PLAINTIFF'S
 EXHIBIT
G

Don 24

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW DIVISION

Washington
 Plaintiffs

Jackson
 Defendants

NO: 14 L 8918

14 L 932

Motion Call: "D" Time: 10³⁰ Line 85

2005 Trial Date: _____

****CASE MANAGEMENT ORDER****

(Please check off all pertinent paragraphs and circle proper party name)



- (8230) 1. Category #1 (18-mo. discovery) (8232) 1A. Category #2 (28-mo. Discovery)
- (4231) 2. Written, 213(f)(1), (f)(2) and 214 discovery to be issued by _____ or deemed waived;
- (4296) 3. Written, 213(f)(1), (f)(2) and 214 discovery to be answered by _____
- (4218) 4. Party depositions, fact, 213(f)(1) and/or (2) depositions to be completed by _____
- (4288) 5. Subpoenas for treating physicians' depositions issued by _____ or deemed waived;
- (4218) 6. Treating physician depositions to be completed by _____
- (4206) 7. (Plaintiff) - (Defendant) - (Add. Party) shall answer 213(f)(3) interrogatories by _____
- (4218) 8. Plaintiff's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 9. Defendant's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 10. Add. Party's 213(f)(3) witnesses' depositions to be complete by _____
- (4295) 11. All fact discovery, SCR 213(f)(1) and/or SCR(f)(2) discovery is closed. (Circle all applicable)
- (4619) 12. The matter is continued for subsequent Case Management Conference on 6/5/15 at 10:30 AM in Room 2207 for.

- (A) Proper Service (B) Appearance of D'S & TPD'S (C) Case Value
- (D) Pleadings Status (E) Discovery Status (F) Pre-Trial/Settlement
- (G) Mediation Status (H) Trial Certification (I) Other (specify below)

Dep of Dr. Physician Variant to proceed by
next CMC.

(4005) 13. Case is DWP'd

(4331) 14. Case Stricken from CMC Call

(4040) The Case is Voluntarily dismissed pursuant to 735 ILCS 5/2-1009

(4284) Motion Stricken or Withdrawn from Call (4330) Case Stricken from Motion Call

ENTER: Jane Adams

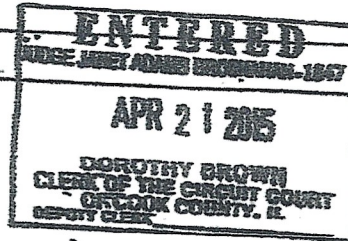
ATTY NAME: Karschner
 ADDRESS: 37 N Dearborn
 PHONE: 746-7191
 ATTY ID#: 02324
 ATTY FOR PARTY: 11

NOTICE:

* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES.

* FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219 SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

JUDGE



PLAINTIFF'S EXHIBIT

H. P. G. I.

#02329 MTJ/cjp

2014S-0157

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

VICQUI WASHINGTON, Mother and Next
Friend of [REDACTED], a minor, and
[REDACTED], a minor.

Plaintiff,

v.

DENNIS JACKSON; and
PHYLICIA VANZANT,

Defendants.

No. 14 L 8928 D

NOTICE OF DISCOVERY DEPOSITION

To: Ms. Phylcia Vanzant
10210 S. Eggleston
Chicago, IL 60628

cc: Mr. Ronald W. Cobb, III
Law Offices of Dwyer & McDevitt
221 N. LaSalle Street, Suite 1600
Chicago, IL 60601
(312) 332-4198 (fax)

YOU ARE HEREBY NOTIFIED that pursuant to the provisions of Section 2-1003 of the Code of Civil Procedure and Rule 202 of the Rules of the Supreme Court, the deposition of PHYLICIA VANZANT will be taken for the purpose of discovery before a Notary Public in and for the County of Cook and State of Illinois, at the hour of 2:00 p.m., on the 26th day of May, 2015, at 33 North Dearborn Street, 21st Floor, Chicago, Illinois, upon interrogatories to be propounded to the said witness orally. This is a request upon you to appear on the date and time stated above along with any and all records, reports, or other documentation relating to the occurrence in question.

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

Matthew T. Jenkins
Corboy & Demetrio, P.C.
Attorney for Plaintiff
33 North Dearborn Street, 21st Floor
Chicago, Illinois 60602
(312) 346-3191

PROOF OF SERVICE

Candace J. Puchek, being first duly sworn on oath, deposes and says that she served the above and foregoing Notice of Discovery Deposition upon the individuals to whom said Notice is directed, via: ☒ Facsimile (Mr. Ronald W. Cobb, III) and ☒ Hand-Delivery (Ms. Phylcia Vanzant) on May 11, 2015.

☒ Under penalties as provided by Law pursuant to 735 ILCS 5/1-100 (2009),
I certify that the statements set forth herein are true and correct.

PLAINTIFF'S
EXHIBIT

H, pg 2

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW DIVISION

Washington for
 Plaintiffs

JACKSON
 Defendants

NO: 14 L 8928 / 14 L 9332

Motion Call: "D" Time: 10:30 Line #: 25

2005 Trial Date: _____

****CASEMANAGEMENT ORDER****

** (Please check off all pertinent paragraphs and circle proper party name) **



- (8230) _____ 1. Category #1 (18-mo. discovery) (8232) _____ 1A. Category #2 (28-mo. Discovery)
- (4231) _____ 2. Written, 213(1)(1), (1)(2) and 214 discovery to be issued by _____ or deemed waived;
- (4296) _____ 3. Written, 213(1)(1), (1)(2) and 214 discovery to be answered by _____
- (4218) _____ 4. Party depositions, fact, 213(1)(1) and/or (2) depositions to be completed by _____
- (4288) _____ 5. Subpoenas for treating physicians' depositions issued by _____ or deemed waived;
- (4218) _____ 6. Treating physician depositions to be completed by _____
- (4206) _____ 7. (Plaintiff) - (Defendant) - (Add. Party) shall answer 213(1)(3) Interrogatories by _____
- (4218) _____ 8. Plaintiff's 213(1)(3) witnesses' depositions to be completed by _____
- (4218) _____ 9. Defendant's 213(1)(3) witnesses' depositions to be completed by _____
- (4218) _____ 10. Add. Party's 213(1)(3) witnesses' depositions to be complete by _____
- (4295) _____ 11. All fact discovery, SCR 213(1)(1) and/or SCR(1)(2) discovery is closed. (Circle all applicable)
- (4619) K 12. The matter is continued for subsequent Case Management Conference on 07/14/15 at 10:30 AM in Room 2207 for:

- (A) _____ Proper Service (B) _____ Appearance of D'S & TPD'S (C) _____ Case Value
- (D) _____ Pleadings Status (E) _____ Discovery Status (F) _____ Pre-Trial/Settlement
- (G) _____ Mediation Status (H) _____ Trial Certification (I) K Other (specify below)
- Status on receipt of insurance info from DOT.

(4005) _____ 13. Case is DWT'd.

(4331) _____ 14. Case Stricken from CMC Call

(4040) _____ The Case is Voluntarily dismissed pursuant to 735 ILCS 5/2-1009

(4284) _____ Motion Stricken or Withdrawn from Call

(4338) _____ Case Stricken from Motion Call

ATTY NAME: McDevitt Law
 ADDRESS: 241 N. LaSalle
 PHONE: (312) 337-0871
 ATTY ID#: 37649
 ATTY FOR PARTY: R

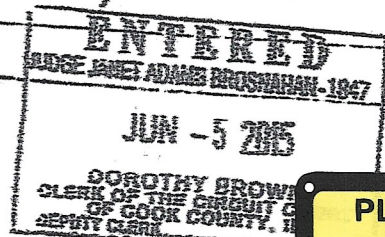
NOTICE:

* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES.

* FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219 SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

ENTER: Janet Adams Brostman

JUDGE



PLAINTIFF'S EXHIBIT

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW DIVISION

Plaintiffs

-v-

Defendants.

Washington / EL Magubier

Jackson

NO: 14 L 5728 / 14 L 9332

Motion Call: "D" Time: 10:30 Line #: 33

2005 Trial Date: None

****CASE MANAGEMENT ORDER****

(Please check off all pertinent paragraphs and circle proper party name)

- (8230) 1. Category #1 (18-mo. discovery) (8232) 1A. Category #2 (28-mo. discovery)
- (4231) 2. Written, 213(f)(1), (f)(2) and 214 discovery to be issued by _____ or deemed waived;
- (4296) 3. Written, 213(f)(1), (f)(2) and 214 discovery to be answered by _____
- (4218) 4. Party depositions, fact, 213(f)(1) and/or (2) depositions to be completed by _____
- (4288) 5. Subpoenas for treating physicians' depositions issued by _____ or deemed waived;
- (4218) 6. Treating physician depositions to be completed by _____
- (4206) 7. (Plaintiff) - (Defendant) - (Add. Party) shall answer 213(f)(3) Interrogatories by _____
- (4218) 8. Plaintiff's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 9. Defendant's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 10. Add. Party's 213(f)(3) witnesses' depositions to be complete by _____
- (4295) 11. All fact discovery, SCR 213(f)(1) and/or SCR(f)(2) discovery is closed. (Circle all applicable)
- (4619) 12. The matter is continued for subsequent Case Management Conference on 8/13/15 at 9:15 AM/PM in Room 2207 for:

- (A) Proper Service (B) Appearance of D'S & TPD'S (C) Case Value
- (D) Pleadings Status (E) Discovery Status (F) Pre-Trial/Settlement
- (G) Mediation Status (H) Trial Certification (I) K Other (specify below)

IT to appear & report on status of UM carrier's investigation.

- (4005) 13. Case is DWP'd. (4040) The Case is Voluntarily dismissed pursuant to 735 ILCS 5/2-1009
- (4331) 14. Case Stricken from CMC Call (4284) Motion Stricken or Withdrawn from Call (4330) Case Stricken from Motion Call

ATTY NAME: McDevitt Law-Pw
 ADDRESS: 221 N. LaSalle
 PHONE: (312) 332-0012
 ATTY ID#: 86118
 ATTY FOR PARTY: K

NOTICE:

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* FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219 SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

ENTER:

JUDGE

ENTERED

JUDGE JANET ADAMS BROSMAN-1847

JUL 14 2015

DOROTHY BROWN
 CLERK OF THE CIRCUIT COURT
 OF COOK COUNTY, IL
 DEPUTY CLERK

**PLAINTIFF'S
 EXHIBIT**

J

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW DIVISION

Washington El Mijaher
 Plaintiffs

-v-
Jackson
 Defendants.

NO: 2014 L 9925 / 2014 L 9332

Motion Call: "D" Time: 9:15 Line #: 7

2005 Trial Date: NOA

****CASE MANAGEMENT ORDER****

**** (Please check off all pertinent paragraphs and circle proper party name) ****



- (8230) 1 Category #1 (18-mo. discovery) (8232) 1A Category #2 (28-mo. Discovery)
- (4231) 2 Written, 213(f)(1), (f)(2) and 214 discovery to be issued by _____ or deemed waived;
- (4296) 3 Written, 213(f)(1), (f)(2) and 214 discovery to be answered by _____
- (4218) 4 Party depositions, fact, 213(f)(1) and/or (2) depositions to be completed by _____
- (4288) 5 Subpoenas for treating physicians' depositions issued by _____ or deemed waived;
- (4218) 6 Treating physician depositions to be completed by _____
- (4206) 7 (Plaintiff) - (Defendant) - (Add. Party) shall answer 213(f)(3) Interrogatories by _____
- (4218) 8 Plaintiff's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 9 Defendant's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 10 Add. Party's 213(f)(3) witnesses' depositions to be complete by _____
- (4295) 11 All fact discovery, SCR 213(f)(1) and/or SCR(f)(2) discovery is closed. (Circle all applicable)
- (4619) K 12 The matter is continued for subsequent Case Management Conference on 02/14/15
 at 9:15 AM PM in Room 2207 for:

- (A) Proper Service (B) Appearance of D'S & TPD'S (C) Case Value
 (D) Pleadings Status (E) Discovery Status (F) Pre-Trial/Settlement
 (G) Mediation Status (H) Trial Certification (I) & Other (specify below)

It to appear & report on status of UM claim, & status of appearance of Jackson pursuant to subpoena.

- (4005) 13 Case is DWP'd. (4040) The Case is Voluntarily dismissed pursuant to 735 ILCS 5/2-1009
- (4331) 14 Case Stricken from CMC Call (4284) Motion Stricken or Withdrawn from Call (4330) Case Stricken from Motion Call

ATTY NAME: McDonnell Law RWC
 ADDRESS: 221 W. LaSalle
 PHONE: (312) 332-0072
 ATTY ID#: 86118
 ATTY FOR PARTY: PL

NOTICE:

* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES.
 * FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219 SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS CMC ORDER WILL CONSTITUTE A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

ENTER: Jane Adams Brogan

JUDGE

ENTERED
 JUDGE JANE ADAMS BROGAN-1947
AUG 13 2015
 DOROTHY BROWN
 CLERK OF THE CIRCUIT COURT
 OF COOK COUNTY, IL
 DEPUTY CLERK

PLAINTIFF'S EXHIBIT

K

#02329 MT/vcp

2014S-0157

Subpoena in a Civil Matter (for Testimony and/or Documents)

(This form replaces CCG N 006 & CCG N 014)

(Rev. 6/25/09) CCG 0106

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

VICQUI WASHINGTON, Mother and Next Friend of

a minor, and a minor,

Plaintiff,

v.

No. 14 L 8928 D

DENNIS JACKSON; and
PHYLCIA VANZANT,

Defendants

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To Ms Phylcia Vanzant, 10210 S Eggleston, Chicago, IL 60628

- ☐ 1 YOU ARE COMMANDED to appear to give your testimony before the Honorable _____
in Room _____, Illinois on _____
at _____ m
- ☒ 2 YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public at _____
in Room 2100, 33 North Dearborn Street, Chicago, Illinois on September 3, 2015
at 2:00 p.m.
- ☐ 3 YOU ARE COMMANDED to mail the following documents in your possession or control to _____
at _____ on or before _____
at _____ m
- (THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES):

☐ Description continued on attached page(s)YOUR FAILURE TO RESPOND TO THIS SUBPOENA WILL SUBJECT YOU TO PUNISHMENT FOR CONTEMPT OF THIS COURT.
Notice to Deponent

- ☐ 1 The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows _____

☐ Description continued on attached page(s)

(A company organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify Ill Sup Ct Rule 206)

- ☐ 2 The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____
(Name of Recording Device Operator)
- 3 No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination Ill Sup Ct Rule 206(d)

Any No #02329
Name Corboy & Demetrio, P C /Matthew T Jenkins
Attorney for Plaintiff
Address 33 North Dearborn Street, 21st Floor
City/State/Zip Chicago, Illinois 60602
Telephone (312) 346-3191

Pro Se 99500

Issued by

☐ Attorney☒ Clerk of Court

Date



- ☐ I served this subpoena by mailing a copy, as required by Ill Sup Ct Rules 11, 12 and 204(a)(2), to _____
by certified mail, return receipt requested (Receipt # _____) on _____
I paid the witness \$ _____ for witness and mileage fees
- ☐ I served this subpoena by handing a copy to _____ on _____

(Signature of Server)

(Print Name)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

PLAINTIFF'S
EXHIBIT

(kf)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

14-159
Atty. No. 56186

ABRAHAM EL-MOGABER,

Plaintiff,

v.

DENNIS JACKSON and
PHYLCIA VANZANT,

Defendants.

No. 2014 L 9332

CC
SI

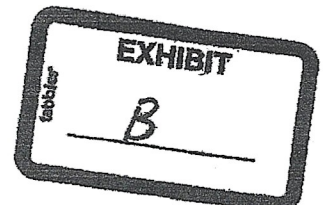
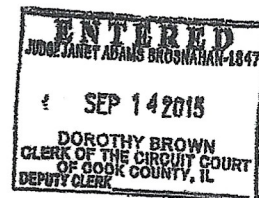
DISMISSAL ORDER

This matter coming to be heard for case management, the Court being fully advised, it is
hereby ordered as follows:

The above-captioned matter is voluntarily dismissed pursuant to 735 ILCS 5/2-1009.

by Plaintiff
4040
Entered:
Janet Adams Broshar
Judge:

McDevitt Law Offices, P.C.
221 North LaSalle Street, Suite 1600
Chicago, IL 60601
(312) 332-0072
Atty. No. 56118



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW DIVISION

Washington
 Plaintiffs

Jackson
 Defendants

NO: 14L 8928 w/ 14L 7332

Motion Call: "D" Time: 1:15 Line #: 66

2005 Trial Date: 0

****CASEMANAGEMENT ORDER****

**** (Please check off all pertinent paragraphs and circle proper party name) ****

- (8230) 1 Category #1 (18-mo. discovery) (8232) 1A Category #2 (28-mo. Discovery)
- (4231) 2 Written, 213(f)(1), (f)(2) and 214 discovery to be issued by _____ or deemed waived;
- (4296) 3 Written, 213(f)(1), (f)(2) and 214 discovery to be answered by _____
- (4218) 4 Party depositions, fact, 213(f)(1) and/or (2) depositions to be completed by _____
- (4288) 5 Subpoenas for treating physicians' depositions issued by _____ or deemed waived;
- (4218) 6 Treating physician depositions to be completed by _____
- (4206) 7 (Plaintiff) – (Defendant) – (Add. Party) shall answer 213(f)(3) Interrogatories by _____
- (4218) 8 Plaintiff's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 9 Defendant's 213(f)(3) witnesses' depositions to be completed by _____
- (4218) 10 Add. Party's 213(f)(3) witnesses' depositions to be complete by _____
- (4295) 11 All fact discovery, SCR 213(f)(1) and/or SCR(f)(2) discovery is closed. (Circle all applicable)
- (4619) 12 The matter is continued for subsequent Case Management Conference on 4/29/15 at 9:15 AM/PM in Room 2207 for _____

- (A) Proper Service (B) Appearance of D'S & TPD'S (C) Case Value
 (D) Pleadings Status (E) Discovery Status (F) Pre-Trial/Settlement
 (G) Mediation Status (H) Trial Certification (I) Other (specify below)

1) Status on Subpoena to Jackson

2) Deposition of Jackson

- (4005) 13 Case is DWP'd. (4040) The Case is Voluntarily dismissed pursuant to 735 ILCS 5/2-1009
- (4331) 14 Case Stricken from CMC Call (4394) Motion Stricken or Withdrawn from Call (4339) Case Stricken from Motion Call

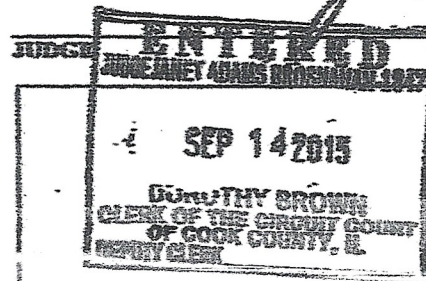
ATTY NAME: Jackson/C. J. D.
 ADDRESS: 33 W. Jackson
 PHONE: 312.346.374
 ATTY ID#: 02329
 ATTY FOR PARTY: 1

NOTICE:

* COPIES OF ALL PRIOR CMC ORDERS MUST BE BROUGHT TO ALL CMC COURT DATES.

* FAILURE OF ANY PARTY TO COMPLY WITH THIS CMC ORDER WILL BE A BASIS FOR SCR 219 SANCTIONS. FAILURE OF ANY PARTY TO ENFORCE THIS ORDER SHALL BE CONSIDERED A WAIVER OF SUCH DISCOVERY BY THAT PARTY.

ENTER:



**PLAINTIFF'S
 EXHIBIT**

M. pg 2

Plaintiff: Vicqui Washington

Case #2023-CV-01211

Date: February 28, 2025

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I respectfully request that the court take the necessary steps to ensure that my family finally receives justice. This includes addressing the failure to inform me of crucial legal actions, the interference with my family's right to proper legal representation, and the unauthorized representation of Plaintiff Washington's family in court. Although I was not personally in the accident, I remain traumatized by the accident and the aftermath of events over the past 10 years. As a mother, I have felt confused, discarded, abandoned, and left out in the cold, while others have lived their lives with limited to no remorse.

I would like the court to know that I still feel guilty that my children trusted me to ensure they would be treated fairly for their injuries, pain, and suffering, which continue to affect them to this day; and I was stripped of my rights to ensure their well-being.

Due to the magnitude of trauma that my family and I have endured and continue to endure, I respectfully request that the court award me every possible compensation and treble damages allowable by the United States Federal Court. Additionally, considering my name is still on the Cook County Circuit Court personal injury lawsuit (2014-L-8928),

I seek restitution for the personal injuries (both mental and physical) sustained by my children as a result of the August 6, 2014 car accident.

Respectfully submitted,

A handwritten signature in cursive script, reading "Virginia Washington". The signature is written in dark ink and includes a long, horizontal flourish at the end.